



June 5, 2015

Mary D. Nichols  
Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**RE: SUPPORT FOR ADF REGULATION ADOPTION**

Dear Chair Nichols:

On behalf of the California Biodiesel Alliance (CBA), I am submitting these comments in support of the adoption of the Alternative Diesel Fuel (ADF) regulation, specifically the *Proposed 15-Day Modification of the Regulation*. As you know, CBA is California's not-for-profit biodiesel industry trade association, representing over 50 businesses and stakeholders, including all of the state's biodiesel producers. As part of a unified industry statement, we support the comments of the National Biodiesel Board.

First, we want to reiterate the thanks, which we and many of our individual members expressed in person at your February 19<sup>th</sup> public meeting, for the extensive work of California Air Resources Board (ARB) staff over many years to craft a path to full legal status for biodiesel in the state that provides clear guidelines for our industry's growth going forward. We are excited about biodiesel's increasing recognition as a widely available drop-in fuel that is making significant contributions to the state's petroleum, carbon, and particulate matter reduction goals while creating good, family-supporting jobs, many in disadvantaged communities.

In previous comments we expressed appreciation for the framework in the regulation that allows biodiesel to move forward with some time to develop a new NOx mitigation additive; for the exemptions for B20 use in light and medium duty fleets and for those with 90% NTDEs; and for the 2019 review that will provide data on actual vehicle miles traveled as fleets turnover to the use of NTDEs. We also especially value the recent addition of a Limited Producer/Importer Exemption for direct sales of B20 to captive fleets that meet certain conditions.

Thank you again for your agency's leadership, and we look forward to working together through the implementation phase of this regulation. Please contact me at 760-398-0815 with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Curtis Wright".

Curtis Wright,  
Chairman  
California Biodiesel Alliance